

March 10, 2009

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch,

I have attached a copy of AsiaTone's 2008 CPNI Certification and Operating Procedures (EB Docket 06-36).

Regards,

A handwritten signature in blue ink, appearing to be 'Nils Johnson', written over a horizontal line.

Nils Johnson

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date filed: March 10, 2009

Name of company covered by this certification: AsiaTone LLC (the "Company")

Form 499 Filer ID: 0000011478

Name of signatory: Nils Johnson


Title of signatory: President

I, Nils Johnson, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the applicable requirements of 47 C.F.R. § 64 Subpart U – Customer Proprietary Network Information ("CPNI").

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that this company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

AsiaTone LLC

Signed



Nils Johnson
11 Broadway
Suite 410
New York, NY 10004
Telephone: (917) 930-7352
Facsimile: (212) 635-2114

AsiaTone LLC

2008 Statement of CPNI Operating Procedures
March 10, 2009

1. AsiaTone LLC (the "Company") is a small telecom service provider which provides international long distance calls to its customers in addition to managing a niche wholesale carrier business. The Company serves approximately 10,000 customers and has 14 full-time employees.
2. Use of CPNI.
 - a. *Billing purposes.* The Company has engaged an independent contractor to perform billing services that are necessary to the provision of service to the Company's customers. The Company shares CPNI data with this billing agent only to the extent necessary for generating bills for its customers. All such disclosure of CPNI data is subject to a mutual confidentiality provision contained in the agreement between the Company and its billing agent.
 - b. *Marketing or other purposes.* Except as described herein, the Company does not release any CPNI data to any third party or agent, including joint venture partners or independent contractors, without an affirmative prior request by the customer.
3. Customer access to CPNI data. Access to CPNI during customer-initiated telephone contact or online access to a customer's account is restricted. Access restrictions include the use of password-protected secure databases as well as conventional information security methods. Specifically, all customers must be authenticated before CPNI is made accessible by means of a user name and/or password authentication system.
4. Employee access to CPNI data. Access to all forms of CPNI that are stored by the Company is restricted to authorized personnel only. All Company employees who may have access to CPNI are educated about the CPNI rules, including when and how CPNI may be used or disclosed to customers or third parties.
5. Customer complaints. The Company has not received any customer complaints in the past two years concerning the unauthorized release of CPNI.
6. Notification of CPNI security breaches. In the past two years, the Company has not discovered and is not aware of any breaches of its customers' CPNI. In the event that the Company discovers any breaches of its customers' CPNI, it will maintain records of such breaches and comply with all applicable notification requirements contained in 47 C.F.R. §§ 64.2001 – 64.2011.
7. Actions against data brokers. The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past two years.